

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

**IN RE: AMERICAN MEDICAL
COLLECTION AGENCY, INC.,
CUSTOMER DATA SECURITY
BREACH LITIGATION**

*This Document Relates To:
All Actions*

No. 19-md-2904 (MCA) (MAH)

**DECLARATION OF
EDWARD J. FANNING, JR., ESQ.,
IN SUPPORT OF APPLICATION
FOR *PRO HAC VICE* ADMISSION
OF JOSEPH J. CAVANAUGH, ESQ.**

I, Edward J. Fanning, Jr., an attorney duly admitted to practice law in the Courts of the State of New Jersey and the United States District Court for the District of New Jersey, hereby declare pursuant to Local Civil Rule 101.1(c) as follows:

1. I am an attorney and partner with the law firm of McCarter & English LLP, counsel for Defendants Laboratory Corporation of America Holdings and Laboratory Corporation of America in the above-captioned matter. I submit this Declaration in support of Defendants' application for an Order admitting Joseph J. Cavanaugh, Esq. as counsel *pro hac vice* in this matter, pursuant to Local Civil Rule 101.1(c). I am personally familiar with the facts set forth in this Declaration.

2. I am a member in good standing of the New Jersey Bar, having been admitted in 1989, and am also a member of good standing of the United States District Court for the District of New Jersey.
3. MDL Lead Counsel, James E. Cecchi, consents to the *pro hac vice* admission of Joseph J. Cavanaugh, Esq.
4. I agree, pursuant to L. Civ. R. 101.1(c)(2), to make payment to the New Jersey Lawyers' Fund for Client Protection as provided by the New Jersey Court Rule 1:28-2(a) and pay annual fees as provided by New Jersey Court Rule 1:20-1(b) on behalf of Counsel.
5. As set forth in his Declaration, Mr. Cavanaugh practices in Washington, D.C. Laboratory Corporation of America Holdings and Laboratory Corporation of America have requested that Mr. Cavanaugh be admitted *pro hac vice* in order to represent them in this matter.
6. The proposed Order sets forth that all pleadings, briefs and papers filed with the Court will be signed by Hogan Lovells US LLP or McCarter & English, LLP as attorneys of record, and we will be responsible for the conduct of this action and of counsel as set forth in L. Civ. R. 101.1(c).
7. For the foregoing reasons, I respectfully request that the Court enter the proposed Order to admit *pro hac vice* Joseph J. Cavanaugh, Esq.

8. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: January 10, 2025

/s/ Edward J. Fanning, Jr.
Edward J. Fanning, Jr.